

ORIGINAL

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

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AUG 5 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MM Docket No. 98-198
Table of Allotments	)	RM-9304, RM-9492, RM-9524,
FM Broadcast Stations	)	RM-9547, RM-9548, RM-9690
(Cross Plains, Texas et al.)	)	

To: Chief, Allocations Branch  
 Policy and Rules Division  
 Mass Media Bureau

**SECOND REPLY COMMENTS**

First Broadcasting Management, LLC, Gain-Air, Inc., and KCYT-FM License Corp. (collectively, "FBM"), by their respective counsel, hereby submit reply comments pursuant to the Commission's Public Notice in the above-captioned proceeding.<sup>1</sup> The purpose of this reply is to update the record with respect to certain changes that have occurred since the filing of the Counterproposal by FBM and provide corrections to the Commission's records. No other proposals currently pending in this proceeding conflict with FBM's Counterproposal.<sup>2</sup>

**I. Corrections to the Public Notice and the Commission's FM Engineering Data Base**

The Public Notice and the Commission's FM Engineering Data Base contain several minor errors that should be rectified, as described below.

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1. Report No. 2346 (July 21, 1999), as corrected (July 29, 1999).
  2. The original petitioner, ALALATEX Broadcasting, has withdrawn its petition. *See* Comments of ALALATEX (filed Feb. 16, 1999). Sonoma Media Corp. likewise has dismissed its counterproposal in this proceeding. *See* Motion to Withdraw and Dismiss Counterproposal (filed Aug. 3, 1999). Finally, Wagonwheel Broadcasting of Santa Anna has amended its proposal to remove the conflict with FBM's Counterproposal, as discussed in more detail below.

- ***KWOW, Clifton, Texas.*** The Data Base correctly contains an entry noting FBM's proposal to substitute Channel 281C3 for Channel 277C3 at the current operating site of Station KWOW, Clifton, Texas. However, the Data Base fails to include an additional entry to protect the proposed substitution of Channel 281C3 for Channel 277C3 at the site specified in the construction permit issued for KWOW (File No. BPH-971222IE). The coordinates are **31° 44' 05" North Latitude, 97° 19' 17" West Longitude.**
- ***KLBC, Durant, OK.*** While the Public Notice correctly noted that FBM proposed the substitution of either Channel 292A or Channel 292C3 for Channel 296C3 for Station KLBC, Durant, Oklahoma, it failed to note that the substitution of Channel 292C3 requires a site change. The correct coordinates for Channel 292C3 at Durant are **34° 03' 12" North Latitude, 96° 14' 13" West Longitude.** A corresponding entry should be made in the Data Base.<sup>3</sup>
- ***NEW Channel 296A, Campbell, TX.*** The Public Notice correctly notes that FBM proposes to allot channel 296A to Campbell, Texas. However, this change is incorrectly entered in the Data Base as deleting channel 296A from Campbell.
- ***Vacant Channel 294C2, Detroit, TX.*** The Public Notice lists incorrect coordinates for the proposed substitution of Channel 282C2 for Channel 294C2 at Detroit, Texas. The correct coordinates are **33° 46' 41" North Latitude, 95° 21' 39" West Longitude.** However, as discussed below, FBM herein proposes alternate coordinates in order to accommodate the allotment of Channel 282A at Fouke, Arkansas proposed in a subsequent proceeding (MM Docket No. 99-241).
- ***KYNZ, Lone Grove, OK.*** The Data Base incorrectly lists the community of license of Station KYNZ as "Lonegrove, Texas" instead of Lone Grove, Oklahoma. The reference coordinates are correct.

## II. A Subsequent Proceeding Has Eliminated the Need to Relocate Station KCLI, Clinton, Oklahoma

In its Counterproposal, FBM proposed to allot Channel 294C to Muenster, Texas. FBM noted that in order to effectuate this allotment, Station KCLI-FM, which was then allotted to Clinton, Oklahoma, would be required to change its transmitter site. FBM included a statement from the licensee of KCLI-FM consenting to the change. However, on March 5, 1999, the Commission

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3. A proposal to substitute Channel 292A for Channel 296A at Durant was withdrawn in MM Docket 98-63. *See Pottsboro, Texas et al.*, DA 99-318 (rel. Feb. 12, 1999).

granted a petition to relocate Channel 294C2 from Clinton to Okarche, Oklahoma, and modify the license of KCLI-FM to specify Okarche as that station's community of license in MM Docket No. 98-70. That proceeding is now final. As FBM had previously noted, the new Okarche allotment is fully spaced to FBM's Counterproposal. The relocation of Station KCLI-FM from Clinton to Okarche has eliminated the need for any further modification to that station as a result of FBM's Counterproposal.<sup>4</sup>

### **III. A Subsequent Proceeding Has Eliminated Any Conflict with Station KMAD, Madill, Oklahoma**

Before FBM filed its Counterproposal, a proposal had been advanced in MM Docket 98-63 to allot Channel 296A to Madill, Oklahoma for Station KMAD-FM. The Madill allotment would have conflicted with the Counterproposal's proposed allotments of Channel 296C1 to Benbrook, Texas for Station KDXT and Channel 296C3 to Lone Grove for Station KYNZ. However, FBM noted that at the time of the Counterproposal, the proponent of the Madill allotment had withdrawn its proposal and agreed to a settlement in MM Docket 98-63. That settlement was uncontested, and because the Madill license agreed to an alternate channel change, the Counterproposal was not contingent on the outcome of MM Docket 98-63. In any event, the Commission has issued a final order in that proceeding dismissing the proposal to allot Channel 296A to Madill. No conflict now exists which would prevent the allotments of Channel 296C1 to Benbrook and 296C3 to Lone Grove as part of the Counterproposal.

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4. A subsequently filed application filed by Station KCLI-FM at Okarche (BPH-990419IE) is short-spaced to FBM's proposal to allot Channel 294C to Muenster.

**IV. A Subsequent Proceeding Has Eliminated Any Conflict with Channel 291A at Mason, Texas**

FBM's Counterproposal noted that a number of channels had been proposed for Mason, Texas in MM Docket No. 97-244 but only one such channel, Channel 291A, would be in conflict with FBM's proposed allotment of Channel 291A to San Saba, Texas. On June 11, 1999, the Commission issued a Report and Order allotting Channel 224A to Mason. MM Docket No. 97-244. That order is now final. Therefore, no further changes need to be made with respect to the Mason allotment to effectuate the FBM Counterproposal.

**V. FBM Reverts to Its Initial Proposal to Allot Channel 272C3 at Coleman, Texas**

In the Counterproposal, FBM proposed the substitution of Channel 272C3 for Channel 296C3 at Coleman, Texas for Station KSTA(FM). Subsequently, Gulfwest Broadcasting Company and Sonoma Media Corporation ("Gulfwest/Sonoma") filed a counterproposal proposing to allot Channel 272C1 at Cross Plains, Texas. Gulfwest/Sonoma's proposed allotment of Channel 272C1 at Cross Plains conflicted with FBM's proposed allotment of Channel 272C3 at Coleman. In a supplement to its Counterproposal filed on January 27, 1999, FBM proposed to resolve this conflict by suggesting the alternate substitution of Channel 250C3 instead of 272C3 for Channel 296C3 at Coleman.

FBM has recently learned that only a few days earlier, on January 22, 1999, an application for a one-step upgrade was filed by Station KKHR, Anson, Texas to operate on Channel 251C1 (File No. 990122IG). FBM's revised proposal to allot Channel 250C3 to Coleman conflicts with this earlier-filed application. However, FBM's original proposal to allot Channel 272C3 to Coleman does not conflict. Gulfwest/Sonoma has withdrawn its proposal to allot Channel 272C1 to Cross Plains, removing any conflict between Gulfwest/Sonoma and FBM in this proceeding. Accordingly,

FBM desires to have the Commission consider Channel 272C3 as a substitute channel at Coleman. The channel study was provided in the original counterproposal and is still valid.

**VI. The Commission has Inadvertently Accepted a Conflicting Proposal for Fouke, Arkansas**

On January 21, 1999, a petition for rule making was filed to relocate and change the community of license for Station KLMZ(FM) from Stamps, Arkansas to Fouke, Arkansas which conflicts with FBM's Counterproposal. Specifically, the petition proposes to allot Channel 282A to Fouke, Arkansas, at reference coordinates 33° 15' 42" North Latitude, 93° 53' 06" West Longitude. However, this allotment would conflict with FBM's proposal to allot Channel 282C2 to Detroit, Texas. Since FBM's Counterproposal was timely filed in this proceeding and the subsequently filed proposal for Fouke was filed too late to be considered in this proceeding, the Fouke proposal should not have been accepted for filing.

However, FBM can accommodate the Fouke proposal with a change to the reference coordinates of the vacant allotment at Detroit. Specifically, Channel 282C2 can be substituted for Channel 294C2 at Detroit at coordinates 33° 47' 21" North Latitude, 95° 33' 07" West Longitude. When considered together with FBM's original proposal to substitute Channel 262A for Channel 284A at Antlers, Oklahoma, this reference coordinate change gives clear spacing to the Fouke proposal. See Channel Study Exhibit E, Figure 3.

**VII. No Modifications are Necessary to Station KITX, Hugo, Oklahoma.**

In its Counterproposal, FBM included channel studies demonstrating that Channel 282C2 could be substituted at Hugo, Oklahoma should the Commission reverse its decision in MM Docket

97-26.<sup>5</sup> A separate counterproposal has been filed in this proceeding offering, *inter alia*, a resolution of Docket 97-26.<sup>6</sup> If the Commission grants that counterproposal as part of this proceeding then no change is necessary at Hugo since Channel 238C2 will remain allotted there.

#### **VIII. Wagonwheel Has Eliminated the Conflict with its New Allotment at Santa Anna.**

Wagonwheel Broadcasting of Santa Anna filed a petition for rule making requesting the allotment of Channel 290C2 to Santa Anna, Texas. That proposal conflicted with FBM's proposal to allot Channel 290C3 to Cross Plains, Texas and its proposal to substitute Channel 291A for Channel 246A at San Saba, Texas. On August 4, 1999, Wagonwheel amended its proposal to request the allotment of Channel 288C3 at Santa Anna.<sup>7</sup> The amended proposal removes all conflicts with the FBM Counterproposal. *See* Exhibit E, Figure 7. No declaration is necessary since there is no agreement, written or oral, express or implied, between Wagonwheel and FBM. *See* 47 C.F.R. § 1.420(j).

#### **CONCLUSION**

FBM commends the Commission's staff for its efforts in reviewing the complex proposals in this proceeding. With the few changes noted herein, the way is cleared for the Counterproposal to be granted. The licensees of Stations KXGM, Muenster, Texas and KDXT, Granbury, Texas each hereby reaffirm their interest in applying for their respective channels if reallocated as proposed. FBM can assure the Commission that, although complex, the Counterproposal can be effectuated

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5. In that proceeding, the Commission allotted Channel 294C2 to Detroit, Texas and denied the substitution of Channel 294C2 for Channel 238C2 at Hugo, Oklahoma. *See* 13 FCC Rcd 15591 (1998), *review pending*.

6. *See* RM-9547. That proposal offers Station KHYI, Howe, Texas the ability to upgrade on Channel 237C2 without requiring a channel change at Hugo.

7. *See* Reply Comments and Counterproposal of Wagonwheel (filed Aug. 4, 1999).

in a timely manner with minimum disruption to the public and without undue strain on the Commission's resources.

Respectfully submitted,

GAIN-AIR, INC.

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August 5, 1999

8. New address and telephone number.

## **Engineering Statement**

### **In Support of**

### **Second Reply Comments**

### **MM Docket 98-198**

**First Broadcasting Management, LLC  
Gain-Air, Inc.  
KCYT-FM License Corp.**

The instant engineering statement is submitted in support of the counterproposal in the above captioned docket that was filed by First Broadcasting Management, LLC; Gain-Air, Inc.; and KCYT-FM License Corp. (collectively known as "FBM"). There have been several changes in the Commission's technical database that have a direct bearing on the implementation of the FBM counterproposal. In addition, the Public Notice (Report Number 2346) and the Commission's technical database contain minor errors that should be corrected. This statement proposes to use the original counterproposal as reference and point out the changes in that need to be made in the database and the Public Notice.

The corrections are as follows:

1. ***KWOW, Clifton, Texas.*** The Public Notice lists the proposed substitution of channel 281C3 for channel 277C3 at the current licensed site of KWOW. However, the Public Notice and the database do not include an entry for the KWOW CP site as it relates to channel 281C3. The original counterproposal listed channel studies for both the licensed and CP sites of KWOW. In order to give the KWOW.C site full spacing protection, this entry should be added to the database and the Public Notice. See "Exhibits Explained."
2. ***KLBC, Durant, Oklahoma.*** The original counterproposal offered the substitution of channel 292A for channel 296A at the licensed site of KLBC. It also offered channel 292C3 as a substitution, but with a site restriction. The database and the Public Notice incorrectly proposed the substitution of channel 292C3 at the licensed site of KLBC. Entries should be made in both the database and the Public Notice that list the correct channel 292C3 reference coordinates. See "Exhibits Explained."



3. **NEW(FM), Campbell, Texas.** The original counterproposal and the Public Notice correctly list Campbell, Texas as AD296A. However, the database lists channel 296A at Campbell as DE296A. The reference coordinates are correct.
4. **AD282C2, Detroit, Texas.** The reference coordinates for the FBM substitution of channel 282C2 for channel 294C2 at Detroit are in error in both the Public Notice and the database. The original counterproposal is 124.33 kilometers from the coordinates listed in both the database and the Public Notice. However, FBM would like to take this opportunity to modify the reference of channel 282C2 at Detroit to a reference point that clears the proposed allotment of channel 282A at Fouke, Arkansas. If the channel 282C2 at Detroit reference coordinates are modified to North Latitude 33-47-21; West Longitude 95-33-07, it creates clear spacing to Fouke and short spacing to only the unused channel 284A at Antlers, Oklahoma. In the original FBM counterproposal, the substitution of channel 262A for channel 284A at Antlers was proposed in order to accommodate a possible needed substitution of channel 282C2 for channel 238C2 at Hugo, Oklahoma (KITX). For reasons discussed later, the substitution of channel 282C2 for channel 238C2 at Hugo is no longer needed. However, channel 262A can be substituted for channel 284A at Antlers, which gives clear spacing to channel 282C2 at Detroit when its reference coordinates are modified to accommodate AD282A at Fouke, Arkansas. See "Exhibits Explained."
5. **KYNZ, Lone Grove, Oklahoma.** The database incorrectly lists all of the proposed FBM changes as "Lonegrove, Texas" instead of "Lone Grove, Oklahoma." All reference coordinates are correct.

In addition to the needed database and Public Notice changes listed above, several changes have occurred in the database that have simplified the implementation of the FBM counterproposal. Those changes are as follows:

1. **KCLI, Clinton, Oklahoma.** The original FBM counterproposal contained an agreement with the licensee of KCLI on channel 294C1 that consented to a site reference change. However, in a subsequent proceeding, channel 294C1 at Clinton was deleted and channel 294C2 at Okarche was allocated. The allotment reference coordinates for channel 294C2 at Okarche are fully spaced to the FBM proposed allotment of channel 294C at Muenster, Texas. Therefore, since the decisions of this Docket (98-70) have become final, the short spacing between AD294C at Muenster and KCLI on channel 294C1 at Clinton are no longer a concern. However, when the KCLI licensee prepared the FCC Form 301 for the implementation of MM Docket 98-70, the proposed allotment of channel 294C at Muenster was not in the database. As a result, the pending application for KCLI at Okarche is short spaced to AD294C at Muenster by 4.97 kilometers. The KCLI licensee is aware of this infraction and is currently taking corrective action.

2. ***KMAD, Madill, Oklahoma.*** When FBM filed its counterproposal, the proposed substitution of channel 296A (also channel 296C3) at Madill, Oklahoma appeared in the database. This was despite a settlement agreement reached between all parties involved in MM Docket 98-63. That settlement called for channel 273C2 to be allocated at Whitesboro, Texas with channel 273A being deleted at Madill, Oklahoma. As a result, no substitute channels were considered for Madill and the use of channel 296A in this proceeding became a nonfactor.
3. ***AD291A, Mason, Texas.*** At the time of the FBM counterproposal, channel 291A was proposed to be allocated at Mason, Texas. This proposed allocation was in conflict with channel 291A at the licensed site of KBAL, San Saba, Texas. FBM offered substitute channels of 224A, 259A, and 281A. However, in a subsequent proceeding (MM Docket 97-244), the Commission allotted channel 224A to Mason, Texas in lieu of channel 291A. Therefore, channel 291A at Mason no longer exists as a conflict between it and channel 291A at San Saba.
4. ***KSTA, Coleman, Texas.*** Presently KSTA operates on channel 296C3. This created a short space with the FBM proposed allotment of channel 296C1 at Benbrook, Texas. Therefore, in the original counterproposal, FBM proposed the substitution of channel 272C3 for channel 296C3 at Coleman. In order to avoid conflict with a counterproposal filed by Gulfwest Broadcasting Company and Sonoma Media Corporation ("Gulfwest/Sonoma"), FBM filed a supplement proposing the substitution of channel 250C3 at Coleman. However, FBM was not aware that 5 days earlier KKHR, Anson, Texas, filed a one-step upgrade to operate on channel 251C1. This application created prohibited short space to the use of channel 250C3 at Coleman. Gulfwest/Sonoma is currently in the process of withdrawing its counterproposal that requested the allotment of channel 272C1 at Cross Plains, Texas. Therefore, the original FBM proposal for the substitution of channel 272C3 for channel 296C3 at the KSTA licensed site can be implemented without spacing conflict. Never at any time should the FBM supplement proposing the use of channel 250C3 at Coleman be construed as a withdrawal of its original proposal of the substitution of channel 272C3 at Coleman. The supplement was merely an effort to eliminate possible conflict.
5. ***KITX, Hugo, Oklahoma.*** The original FBM counterproposal included channel studies for the possible substitution of channel 282C2 at the licensed site of KITX. However, in subsequent dockets (MM Dockets 97-26 and 97-91) the Commission decided that KITX would remain on its current channel of 238C2. Therefore, if the joint counterproposal/global resolution is granted in MM Docket 98-198, KITX in Hugo, Oklahoma is no longer needed in this proceeding.
6. ***AD290C2, Santa Anna, Texas.*** At the Comment stage of MM Docket 98-198, Wagonwheel Broadcasting of Santa Anna filed a counterproposal seeking the allotment of channel 290C2 to Santa Anna at a new service. This proposal was in conflict with the FBM proposed substitution of channel 290C3 for channel 245C3 at Cross Plains. However, this conflict was eliminated when the Cross Plains petitioner withdrew from the proceeding. The Wagonwheel counterproposal was

still in conflict with the FBM scenario because channel 290C2 at Santa Anna created a short space the substitution of channel 291A (or channel 289A) at the licensed site of KBAL(FM), channel 246A San Saba, Texas. The legal counsel for Wagonwheel informed FBM that it was withdrawing its request for channel 290C2 at Santa Anna and was requesting the allocation of channel 288C3 in order to obtain a more expedient service to the area listeners. Therefore, the conflict between the Wagonwheel counterproposal and the FBM portion of MM Docket 98-198 is eliminated. The proposed allotment of channel 288C3 at Santa Anna does not conflict with any portion of the FBM counterproposal.

### **Exhibits Explained**

Exhibit E, Figure 1 is an allocation study using the CP site of KWOW, Clifton, Texas as reference. The channel considered is 281C3. This reference should be placed in the Commission's database in order to provide protection for KWOW on channel 281C3.

Exhibit E, Figure 2 is a channel study for the substitution of channel 292C3 at Durant, Oklahoma. It uses the original FBM substitution coordinates as reference. These reference coordinates for channel 292C3 at Durant should be placed in the database to eliminate the apparent short spacing created when the licensed site for KLBC is used as reference.

Exhibit E, Figure 3 is an allocation study for the substitution of channel 282C2 at Detroit, Texas. It uses a reference site that provides the required 70 dBu over Detroit and also provides the required spacing to channel 282A at Fouke, Arkansas. The study does depict short spacing to unused channel 284A at Antlers, Oklahoma. However, as shown by Exhibit E, Figure 4, channel 262A can be substituted for channel 284A at Antlers without involved additional communities and/or channels. Exhibit E, Figure 5 is a hypothetical class C2 70 dBu contour map that shows 100% coverage of the city of Detroit, Texas by the proposed allocation of channel 282C2. Exhibit E, Figure 6 is a similar map for the allocation of channel 262A at Antlers.

Exhibit E, Figure 7 is a channel study using the requested allotment coordinates of Wagonwheel for channel 288C3 at Santa Anna. It illustrates that no portion of FBM's scenario in MM Docket 98-198 is in conflict with the new Wagonwheel request.

### **Conclusion**

The instant engineering statement supports the FBM reply concerning minor changes needed in the Commission's Public Notice and database necessary to bring them into agreement with the FBM counterproposal. In addition, this statement has verified that subsequent changes in other spectrum proceedings have made several aspects of the FBM counterproposal moot.

When the corrections and modifications proposed in the FBM instant reply comments are executed, the counterproposal filed by FBM in MM Docket 98-198 is without conflict. The conflicting counterproposals and petitions of all other parties have been either eliminated or dismissed. FBM has submitted a scenario that can be adopted by the Commission without further modifications or delays.

# ENGINEERING STATEMENT

## In Support of

### Second Reply Comments MM Docket 98-198 First Broadcasting Management, LLC.

ALLOCATION STUDY - CHANNEL 281C3 (KWOW.C) CLIFTON, TX  
[DEPICTING SPACING FOR USE OF CH 281C3 AT KWOW.C SITE]  
(USING KWOW.C SITE AS REFERENCE)

31 44 05 N.			Class C3			Search Date	
97 19 17 W.			Current rules spacings			08-04-99	
----- Channel 281 -104.1 MHz -----			-----				
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----			-----				
Community of Clifton			TX	281.9	25.04		
Reference Coordinates:							
North latitude: 31-46-53							
West Longitude: 97-34-48							
AD281	281C3	Clifton	TX	297.7	14.26	153.0	-138.74 *
AD281	281C3	Clifton	TX	297.7	14.26	153.0	-138.74 *
Of No Concern:							
Reference of proposed Ch 281							
substitution at KWOW licensed site							
DE281	281C1	Brownwood	TX	268.8	159.27	211.0	-51.73 *
DE281	281C1	Brownwood	TX	268.8	159.27	211.0	-51.73 *
KXYLFM	281C1	Brownwood	TX	268.8	159.27	211.0	-51.73 *
DE281	281C1	Brownwood	TX	268.8	159.27	211.0	-51.73 *
Of No Concern:							
Proposed deletion by petitioners							
in instant proceeding (MM Docket 98-198)							
KHLR	280C2	Cameron	TX	157.4	119.83	117.0	2.83 *
KVILFM	279C	Highland Park-Dal	TX	19.2	99.42	96.0	3.42 *
KKDAFM	283C	Dallas	TX	19.0	100.07	96.0	4.07 *
KVILFM	279C	Highland Park-Dal	TX	19.4	100.38	96.0	4.38 *
KKDAFM	283C	Dallas	TX	19.3	100.42	96.0	4.42 *
KKUS	281C2	Tyler	TX	64.1	192.96	177.0	15.96
KQBT	282C2	Taylor	TX	181.6	144.22	117.0	27.22
KXZN	281C3	Sanger	TX	1.5	187.47	153.0	34.47

# ENGINEERING STATEMENT

In Support of

## Second Reply Comments MM Docket 98-198 First Broadcasting Management, LLC.

ALLOCATION STUDY - CHANNEL 292C3 (KLBC.P) DURANT, OK  
[DEPICTING SPACING FOR USE OF CH 292C3 AT PROPOSED ALLOTMENT SITE]  
(USING PROPOSED ALLOTMENT SITE AS REFERENCE)

34 03 12 N.			Class C3				Search Date
96 14 13 W.			Current rules spacings				08-04-99
----- Channel			292A -106.3 MHz	-----			
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----			-----				
<b>Community of Durant</b>			OK	241.9	16.26		
Reference Coordinates:							
North Latitude: 33-59-03							
West Longitude: 96-23-32							
<b>AD292 292C3 Durant</b>			OK	251.6	18.01	153.0	-135.00 *
Of No Concern:							
Proposed Substitution							
Site Reference for CH292A at KLBC							
Licensed Site in MM Docket 98-198							
Class C3 Substitution Appears in							
FCC Database with Incorrect Reference							
Coordinates							
KTLS	293C3	Holdenville	OK	344.6	98.99	99.0	-0.01 *
KHKS	291C	Denton	TX	202.8	176.10	176.0	0.10 *
KHKS.A	291C	Denton	TX	202.9	176.15	176.0	0.15 *
KHKS	291C	Denton	TX	202.9	176.15	176.0	0.15 *
KIXO	291A	Sulphur	OK	313.7	95.88	89.0	6.88 *
KKBI	291C2	Broken Bow	OK	81.0	135.80	117.0	18.80
KXGM	293A	Muenster	TX	245.6	110.17	89.0	21.17
DE293	293A	Muenster	TX	245.6	110.17	89.0	21.17
ALOPEN	294C2	Detroit	TX	108.5	81.16	56.0	25.16
DE294	294C2	Detroit	TX	108.5	81.16	56.0	25.16
KGOU	292A	Norman	OK	323.1	171.37	142.0	29.37
AD294	294C	Muenster	TX	239.4	134.32	96.0	38.32
ALOPEN	292C2	Wichita Falls	TX	265.1	216.29	177.0	39.29
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# ENGINEERING STATEMENT

In Support of

Second Reply Comments  
MM Docket 98-198  
First Broadcasting Management, LLC.

ALLOCATION STUDY - CHANNEL 282C2 (AL294C2) DETROIT, TEXAS  
[DEPICTING SPACING FOR USE OF CH 282C2 AT MODIFIED ALLOTMENT SITE]  
(GIVING CLEARANCE TO AD282A AT FOUKE, ARKANSAS)

33 47 21 N. Class C2 Search Date  
95 33 07 W. Current rules spacings 08-04-99

----- Channel 282 -104.3 MHz -----

Call Ch# City State Bear' Dist' R'grd Margin

Community of Detroit

TX 118.2 30.07

Reference Coordinates:  
North Latitude: 33-39-39  
West Longitude: 95-15-58

AD282 282C2 Detroit

TX 94.0 17.74 190.0 -172.26 \*

Of Note:  
Correct Reference For Substitution  
Of CH282C2 for CH294C2 at Detroit, TX  
Submitted in FBM Counterproposal

AD282 282C2 Detroit

TX 53.3 137.19 190.0 -52.81 \*

Of No Concern:  
Incorrect Reference For Substitution  
Of CH282C2 for CH294C2 at Detroit, TX

ALOPEN 284A Antlers

OK 354.7 49.30 55.0 -5.70 \*

Of Note:  
Substitution of channel 262A  
Proposed in MM Docket 98-198  
Counterproposal Submitted by FBM

AD282 282A Fouke AR 110.7 165.54 166.0 -0.46 \*

KKDAFM 283C Dallas TX 224.8 187.56 188.0 -0.44 \*

KKDAFM 283C Dallas TX 224.9 188.11 188.0 0.11 \*

KKUS 281C2 Tyler TX 177.4 143.74 130.0 13.74

KLMZ.C 282A Stamps AR 102.0 183.89 166.0 17.89

DE282 282A Stamps AR 104.0 184.10 166.0 18.10

KBII.C 281C2 Hatfield AR 53.1 151.38 130.0 21.38

KWNS.C 284A Winnsboro TX 163.0 83.27 55.0 28.27

KJTX 283A Jefferson TX 136.9 146.73 106.0 40.73

KWNS 285A Winnsboro TX 166.8 96.49 55.0 41.49

# ENGINEERING STATEMENT

## In Support of

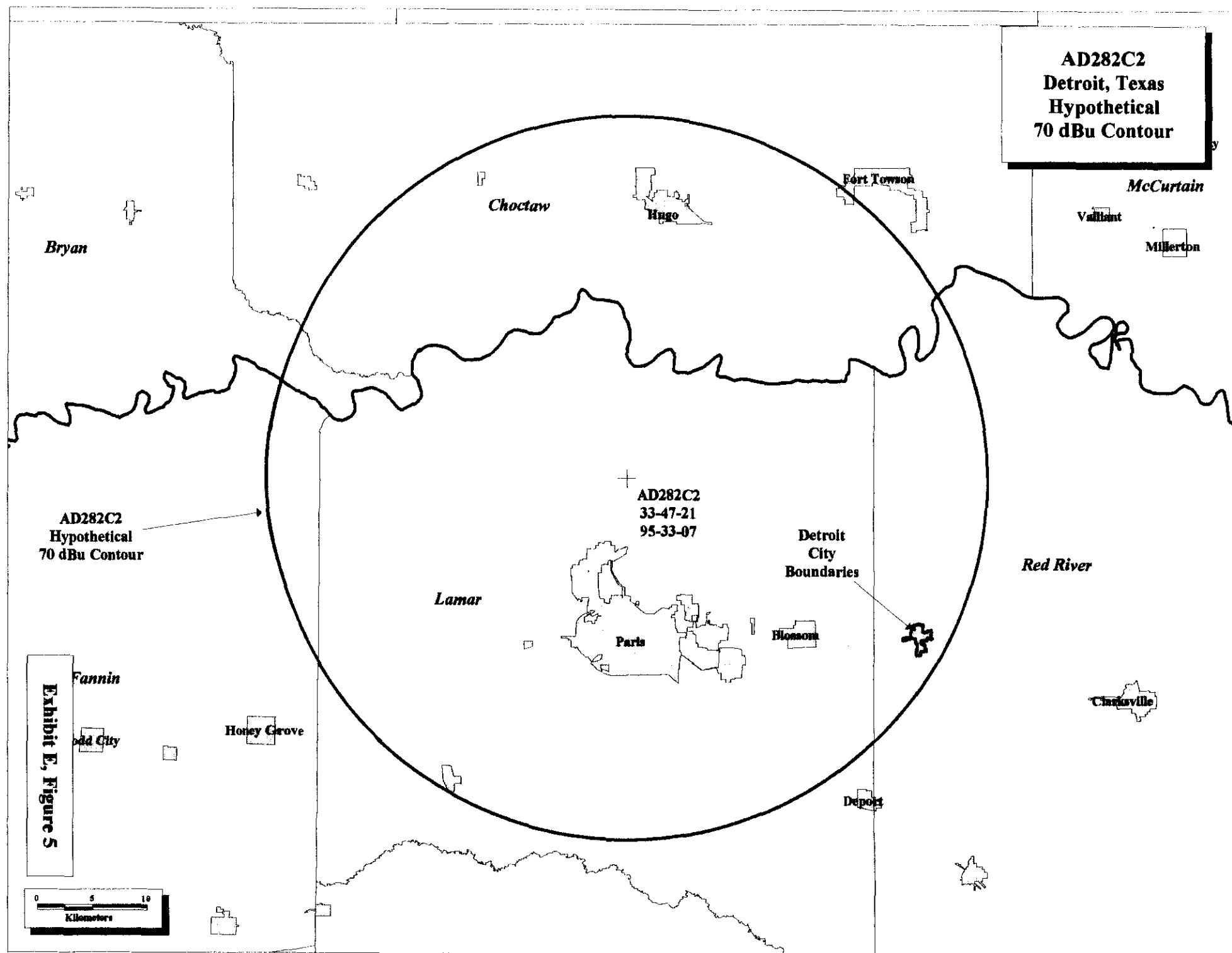
### Second Reply Comments MM Docket 98-198 First Broadcasting Management, LLC.

ALLOCATION STUDY - CHANNEL 262A (AL284A) ANTLERS, OKLAHOMA  
[DEPICTING SPACING FOR USE OF CH 262A AT MODIFIED ALLOTMENT SITE]  
(GIVING CLEARANCE TO CH282C2 MODIFIED SITE AT DETROIT, TEXAS)

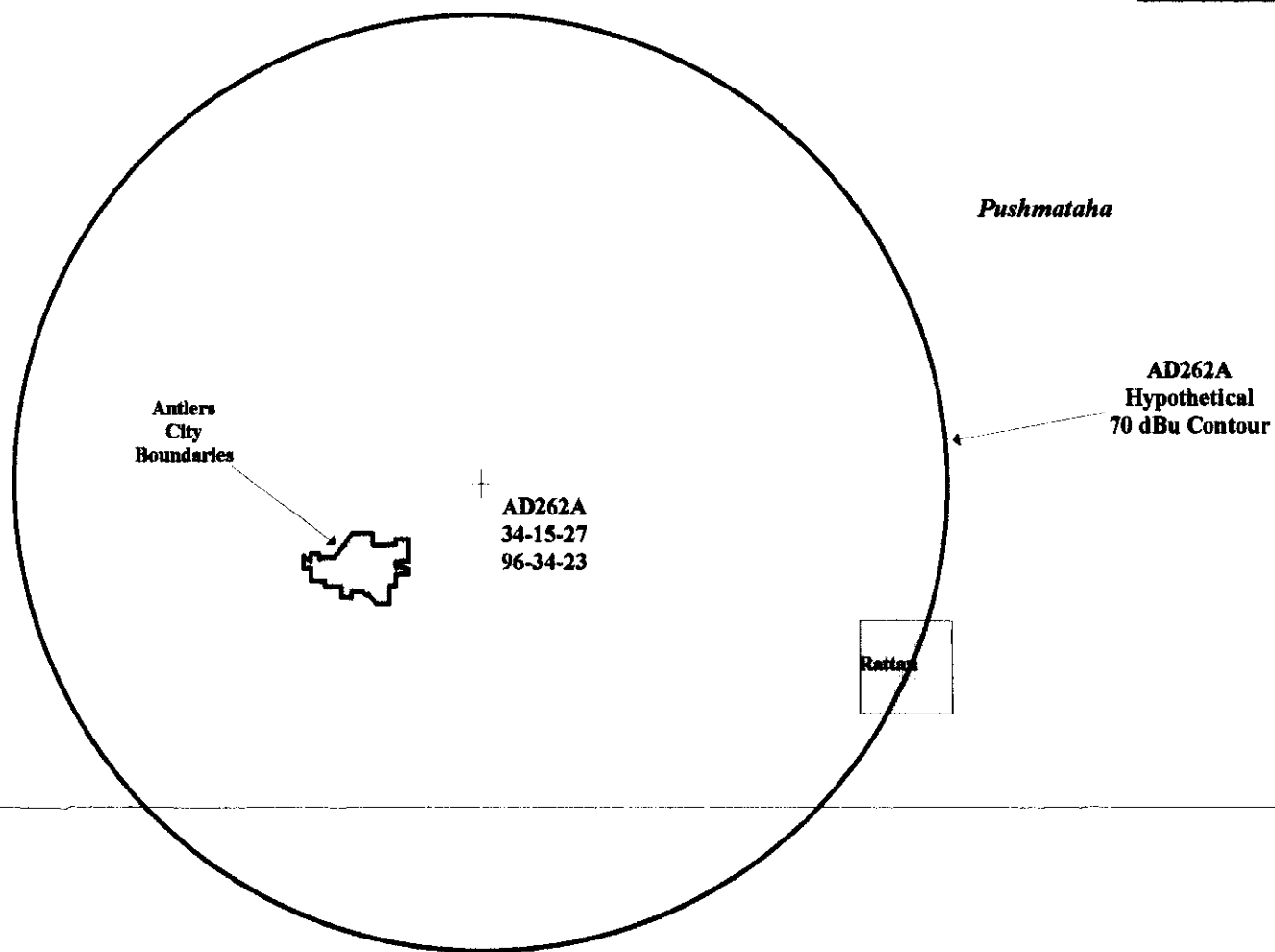
34 15 27 N.			Class A				Search Date
95 34 23 W.			Current rules spacings				08-04-99
----- Channel 262 -100.3 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----							
Community of Antlers			OK	235.5	5.06		
Reference Coordinates:							
North Latitude: 34-13-54							
West Longitude: 95-37-06							
KRBV	262C	Dallas	TX	214.9	226.11	226.0	0.11 *
KRBV	262C	Dallas	TX	215.2	226.52	226.0	0.52 *
KYKC.C	261C2	Byng	OK	301.1	127.75	106.0	21.75
KTCSFM	260C	Fort Smith	AR	42.2	121.90	95.0	26.90
KYKC	261C3	Byng	OK	296.4	116.88	89.0	27.88
DE259	259C3	Tishomingo	OK	277.1	91.50	42.0	49.50
KTSH	259C3	Tishomingo	OK	277.1	91.50	42.0	49.50
-----							



**AD282C2  
Detroit, Texas  
Hypothetical  
70 dBu Contour**



**AD262A**  
**Antlers, Oklahoma**  
**Hypothetical**  
**70 dBu Contour**



**Exhibit E, Figure 6**

0 5 10  
Kilometers

# ENGINEERING STATEMENT

In Support of

Second Reply Comments  
MM Docket 98-198  
First Broadcasting Management, LLC.

ALLOCATION STUDY - CHANNEL 288C3 (AD290C2) SANTA ANNA, TEXAS  
[DEPICTING SPACING FOR USE OF CH 288C3 AT NEW ALLOTMENT SITE]  
(GIVING CLEARANCE TO ALL OTHER MODIFICATIONS IN MM DOCKET 98-198)

31 37 38 N.			Class C3				Search Date
99 20 03 W.			Current rules spacings				08-04-99
----- Channel 288A -105.5 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
<b>Community of Santa Anna</b>			<b>TX</b>	<b>4.1</b>	<b>12.26</b>		
Reference Coordinates:							
North Latitude: 31-44-15							
West Longitude: 99-19-30							
<b>AD290 290C2 Santa Anna</b>			<b>TX</b>	<b>3.2</b>	<b>12.71</b>	<b>56.0</b>	<b>-43.29 *</b>
Of No Concern:							
Previous Proposed Allotment							
By Wagonwheel. Request Withdrawn.							
KEANFM 286C1 Abilene			TX	341.2	76.05	76.0	0.05 *
KYUL 288C2 Harker Heights			TX	113.7	177.06	177.0	0.06 *
KEANFM 286C1 Abilene			TX	341.1	76.06	76.0	0.06 *
AD290 290C3 Cross Plains			TX	13.9	57.25	43.0	14.25
AD290 290C3 Crossplains			TX	13.9	57.25	43.0	14.25
AD290 290C3 Crossplains			TX	13.9	57.25	43.0	14.25
KMDX.C 289C3 San Angelo			TX	259.7	119.17	99.0	20.17
KEANFM 286C1 Abilene			TX	335.7	100.22	76.0	24.22
AD291 291A San Saba			TX	129.4	76.21	42.0	34.21

**Statement of the Consultants**

The engineering section for the instant document was prepared for First Broadcasting Management, LLC; Gain-Air, Inc.; and KCYT License Corp. ("FBM") and supports its 2<sup>nd</sup> reply comments in MM Docket 98-198. It was developed by Lee S. Reynolds and Paul H. Reynolds of Reynolds Technical Associates ("RTA") and may not be used for purposes other than submission to the Commission by FBM.

It may not be reproduced in its entirety, or in part, by anyone (other than from the Commission) without the written consent of RTA.

The information in this application is compiled from the most recent Commission and outside data. RTA is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

For Reynolds Technical Associates:

  
\_\_\_\_\_  
Lee S. Reynolds

August 4<sup>th</sup>, 1999

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## CERTIFICATE OF SERVICE

I, Lisa M. Balzer, a secretary in the law firm of Shook, Hardy & Bacon, do hereby certify that I have on this 5th day of August, 1999 caused to be mailed by first class mail, postage prepaid, copies of the foregoing **"Reply Comments"** to the following:

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\* HAND DELIVERED